

The Honorable Ricardo S. Martinez

**UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE**

STATE OF WASHINGTON,

Plaintiff,

v.

ALDERWOOD SURGICAL CENTER, LLC,  
a Washington limited liability company;  
NORTHWEST NASAL SINUS CENTER,  
P.S., a Washington professional service  
corporation, and JAVAD A. SAJAN, M.D.,

Defendants.

NO. 2:22-cv-01835-RSM

STIPULATED MOTION AND  
ORDER EXTENDING DISCOVERY  
CUTOFF AND DISPOSITIVE  
MOTION DEADLINE

NOTE ON MOTION CALENDAR:  
May 14, 2024

Pursuant to LCR 7(d)(1), the undersigned parties respectfully request that the Court approve a revision to the Case Scheduling Order (Dkt. #76) as revised by the Court's April 19, 2024 Order Granting in Part Perkins Coie's Telephonic Motion to Withdraw (Dkt. #117). The current discovery cutoff is set for May 27, 2024. Dkt. #117 at 7. The current deadline for dispositive motions is June 11, 2024. Dkt. #76. By this stipulation and proposed order, the parties hereby request that the discovery cutoff be moved to June 10, 2024 and the dispositive motion deadline be moved to June 18, 2024. Pursuant to LCR 16(b), any motions to exclude expert testimony (*Daubert* motions) shall also be filed no later than June 18, 2024. The parties request no further changes to the case schedule.

The Court is aware of the procedural history of this case as summarized in its April 19, 2024

Order. Dkt. #117 at 1-2. Subsequent to that Order, on May 8, 2024, undersigned counsel for Defendants made their appearances and Perkins Coie withdrew. Upon appearing, undersigned defense counsel requested further delay of three key scheduled depositions. Plaintiff agreed to a short delay, but even that short delay requires the extension of the discovery and dispositive motion deadlines. By moving these two deadlines the parties intend to keep the remaining case schedule intact, including the September 9, 2024 trial date.


IT IS SO STIPULATED, THROUGH COUNSEL OF RECORD.

DATED this 14th day of May, 2024.

<p>ROBERT W. FERGUSON Attorney General</p> <p><i>s/ Bret Finkelstein</i>  MATTHEW GEYMAN, WSBA #17544  ZORBA LESLIE, WSBA #58523  ALEXANDRA KORY, WSBA #49889  BRET FINKELSTEIN, WSBA #48845  BEN BRYSA CZ, WSBA #54683  RABI LAHIRI, WSBA #44214  Assistant Attorneys General  Attorneys for Plaintiff State of Washington  Consumer Protection Division  Office of the Attorney General  800 Fifth Avenue, Suite 2000  Seattle, WA 98104</p> <p><i>Attorneys for Plaintiff State of Washington</i></p>	<p>CORR CRONIN LLP</p> <p><i>s/ Blake Marks-Dias</i>  STEVEN W. FOGG, WSBA #23528  BLAKE MARKS-DIAS, WSBA #28169  Corr Cronin LLP  1015 2nd Ave 10th Floor  Seattle, WA 98104</p> <p><i>Attorneys for Defendants Alderwood Surgical Center, LLC, Northwest Nasal Sinus Center P.S., and Javad A. Sajan, M.D.</i></p>
<p><i>I certify that this memorandum contains 229 words, in compliance with the Local Civil Rules.</i></p>	

1 PURSUANT TO STIPULATION, IT IS SO ORDERED.  
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4 DATED this 15<sup>th</sup> day of May, 2024.  
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6 RICARDO S. MARTINEZ  
7 UNITED STATES DISTRICT JUDGE  
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